

FILED

2012 JUN 26 PM 4:28

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Name of Defendant(s)

(If more than one Defendant, list the name and address of each additional Defendant)

4. Plaintiff sought employment from the Defendant or was employed by the Defendant at

Nashville Convention Center, Nashville,
 Street address City
 _____, TN, _____
 County State Zip Code

5. Defendant discriminated against Plaintiff in the manner indicated in paragraphs 8 and 9 of this Complaint on or about Filled Aug 15 2011.
 Month Day Year

6. Plaintiff filed charges against the Defendant with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission charging the Defendant with the acts of discrimination indicated in paragraphs 8 and 9 of this Complaint on or about August 15 2011.
 Month Day Year

7. The Equal Employment Opportunity Commission or the United States Department of Justice issued a Notice of Right to Sue which was received by Plaintiff on _____
 _____, a copy of which Notice is attached.

 Day Year

8. Because of Plaintiff's (1) _____ race, (2) _____ color, (3) _____ sex,
 (4) _____ religion, (5) _____ national origin, the Defendant:

- a. _____ failed to employ Plaintiff.
- b. ☒ terminated Plaintiff's employment.
- c. _____ failed to promote Plaintiff.
- d. _____ retaliated against Plaintiff for having filed a charge of discrimination.
- e. _____ other. Explain: Retaliation
- _____
- _____
- _____

9. The circumstances under which Defendant discriminated against Plaintiff were as follows:

I WAS HARASSED AND LIED ON IN
AND effort to make me give a
NEGATIVE REACTION after I continued
to do my job what was asked of
me I WAS DISMISSED FOR NO
REASON Documents Attached

(You may use additional paper, if necessary.)

10. The acts set forth in paragraph 8 of this Complaint:

- a. _____ are still being committed by Defendant.
- b. _____ are no longer being committed by Defendant.
- c. ☒ may still be being committed by Defendant.

11. Plaintiff attaches to this Complaint a copy of the charges filed with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission, which charges are submitted as a brief statement of the facts supporting this Complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief:

- a. _____ direct that Defendant employ Plaintiff, or
- b. _____ direct that Defendant re-employ Plaintiff, or
- c. _____ direct that Defendant promote Plaintiff, or
- d. _____ order other equitable or injunctive relief: Address the problems AND compensate
- e. ☒ direct that Defendant pay Plaintiff back pay in the amount of _____ and interest on back pay;
- f. ☒ direct that Defendant pay Plaintiff compensatory damages: Specify the amount and basis for compensatory damages: _____
- g. ☒ direct that Defendant pay Plaintiff punitive damages in the amount of _____ because Defendant engaged in a discriminatory practice or practices with malice or with reckless indifference to Plaintiff's federally protected rights, as described in paragraphs 8 and 9 above; and that the Court grant such other relief as may be appropriate, including costs and attorney's fees.

Stanley Harris
(Signature of Plaintiff)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA

☒ EEOC

494-2011-01993

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Mr. Stanley Harris

Home Phone (Incl. Area Code)

(615) 474-7670

Date of Birth

04-15-1963

Street Address

1009 Eddystone Court

City, State and ZIP Code

Nashville, TN 37207

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

CLARK CONSTRUCTION GROUP, LLC MID A

No. Employees, Members

Unknown

Phone No. (Include Area Code)

Street Address

7500 Old Georgetown Rd

City, State and ZIP Code

Bethesda, MD 20814

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE

☐ COLOR

☐ SEX

☐ RELIGION

☐ NATIONAL ORIGIN

☒ RETALIATION

☐ AGE

☐ DISABILITY

☐ GENETIC INFORMATION

☐ OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

08-05-2011

08-05-2011

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)).

I was hired by Harmony Construction Group as a Laborer on June 2, 2010. Harmony Construction Group is working on a project for Clark Construction Group. On April 28, 2011, I filed EEOC charge#: 494-2011-01331 against Clark Construction Group for discriminating against me due to my race. On May 31, 2011, I filed EEOC charge#: 494-2011-01537 against Clark Construction Group for discriminating against me in retaliation for opposing unlawful employment practices. On August 5, 2010, I was discharged.

I was told that I am no longer allowed on the job site in accordance with a directive from Peggy Harris, HR Director of both Bell and Associates and Clark Construction Group.

I believe that I was discriminated against in retaliation for opposing unlawful employment practices, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Aug 15, 2011

Date

Stanley Harris

Charging Party Signature

NOTARY - When necessary for State and Federal Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

AUG 15 2011

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

